

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF WEST VIRGINIA
Clarksburg Division**

PAOLO FARAH,

Plaintiff,

v.

**Case No. 1:22-cv-153-TSK
Judge Thomas S. Kleeh**

**WEST VIRGINIA UNIVERSITY
BOARD OF GOVERNORS, SAMUEL TAYLOR,
CODY STEWART, JESSE RICHARDSON,
MAJA HOLMES, KAREN KUNZ,
CHRISTOPHER PLEIN, COREY COLYER,
and LISA DEFRAK-COLE,**

Defendants.

STIPULATION TO EXTEND DEADLINE TO FILE MOTION TO COMPEL

On September 20, 2023, Defendant West Virginia University Board of Governors (the “WVUBOG”) served its First Set of Interrogatories and Requests for Production of Documents upon Plaintiff Paolo Farah (“Plaintiff”). (ECF No. 40.) On October 20, 2023, Plaintiff served his responses. (ECF Nos. 45, 46.)

By letter dated November 6, 2023, the WVUBOG notified Plaintiff of several deficiencies regarding his discovery responses. Plaintiff has agreed to supplement his discovery responses by December 20, 2023, in light of obtaining new counsel as of November 8, 2023. (ECF No. 51.) Accordingly, the parties hereby stipulate and agree, by counsel, that the 30-day deadline for filing a motion to compel regarding the above-referenced discovery responses shall be extended until January 20, 2024. This extension will not interfere with the Scheduling Order.

Respectfully submitted this 15th day of November, 2023.

/s/ Wendy G. Adkins

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**Counsel for West Virginia University
Board of Governors**

/s/ Sean W. Cook (by WGA with permission)

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Counsel for Plaintiff

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CERTIFICATE OF SERVICE

I, Wendy G. Adkins, hereby certify that on November 15, 2023, I electronically filed the foregoing with the using the CM/ECF system, which will send notification of such filing to the following:

Sean W. Cook
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swcook1215@gmail.com

/s/ Wendy G. Adkins

Wendy G. Adkins, Esquire (WVSB #9412)